

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X	:	
UNITED STATES OF AMERICA,	:	09 CR 323 (RPP)
	:	
-against-	:	<u>NOTICE OF MOTION</u>
	:	
ANDREI VOUSTIANIOUK,	:	
	:	
Defendant.	:	
-----X	:	

PLEASE TAKE NOTICE that, upon the annexed affirmation of Kerry A. Lawrence, Esq., and the exhibits attached thereto; the accompanying affidavit of defendant Andrei Voustianiouk; and the accompanying memorandum of law, as well as the pleadings and all prior proceedings herein, defendant Andrei Voustianiouk will move, at the United States Courthouse, 500 Pearl Street, New York, New York 10007, at a date and time to be set by the Court, for an Order:

- (1) suppressing physical evidence seized from defendant's apartment, Fed. R. Crim. P. 12(b)(3);
 - (2) suppressing defendant's statements, Fed. R. Crim. P. 12(b)(3);
 - (3) directing the government to make certain pretrial disclosures, Fed. R. Crim. P. 16;
- and

(4) for such further relief as the Court may deem just and proper.

Dated: White Plains, New York
May 22, 2009

BRICCETTI, CALHOUN & LAWRENCE, LLP

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